

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

ROBERT DAVID STEELE)

et al)

Plaintiffs,)

v.)

Case 3:17-cv-601-MHL

JASON GOODMAN)

et al)

Defendants.)

PLAINTIFFS' LIST OF PROPOSED WITNESSES

Plaintiffs, Robert David Steele and Earth Intelligence Network (“Plaintiffs”), by counsel, pursuant to General Order No. 2020-7 and pursuant to Paragraph 31 of the Initial Pretrial Order [*ECF No. 157 (“IPO”)*] and the Court’s Order entered on January 29, 2020 [*ECF No. 175*], submit the following List of Proposed Witnesses intended to be called at the trial of this action currently scheduled to begin on May 5, 2020:

Plaintiffs, by counsel, intend to call the following Witnesses to testify at trial:

1.	Robert David Steele
2.	Dr. Cynthia McKinney
3.	William Binney
4.	Berto Jongman
5.	Greta Robert
6.	Christine Carmais
7.	L. Lawrence
8.	Angie Blake
9.	Margaret Douglas
10.	Elliott P. Park
11.	Jason Goodman (as an adverse witness)

DATED: March 30, 2020

ROBERT DAVID STEELE
EARTH INTELLIGENCE NETWORK

By: /s/ Steven S. Biss
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Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2020 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel of record and all interested parties receiving notices via CM/ECF, and a copy was emailed in PDF to Defendants, Goodman and Lutzke.

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